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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUL 6 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT:

82-ID-10. Proposed Section 18 exemption for the

use of triadimefon (Bayleton) on sugar beets in

Idaho.

FROM:

Edward Zager, Chemist Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

THRU:

Charles L. Trichilo, Chief

Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

TO:

Emergency Response Section

Registration Division (TS-767)

and

Toxicology Branch

Hazard Evaluation Division (TS-769)

The State of Idaho Department of Agriculture requests a Section 18 exemption for the use of Bayleton 50% Wettable Powder (triadimefon) to control powdery mildew on sugar beets. It is estimated that 100,000 acres of sugar beets would be treated under this request.

The proposed use would permit a single application at the rate of 3-4 oz act/A in 25-30 gallons of water per acre using ground equipment with a 35 day PHI.

There are no residue data in our files reflecting applications of Bayleton to sugar beets.

In the absence of adequate residue data we are unable to estimate residue levels of triadimefon in or on sugar beets that could result from this use.

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Conclusions

1. In the absence of adequate residue data we are unable to estimate residue levels of triadimefon in or on sugar beets and the processed commodities derived from sugar beets that could result from this use.

Recommendation

We recommend against the granting of this Section 18 exemption for the reason given in Conclusion 1.

For further consideration of this request residue data for sugar beets (roots and tops) and its processed fractions (dried pulp, sugar and molasses) reflecting the proposed use of Bayleton are needed.

cc: Bayleton S.F.
R.F.
Section 18 S.F. (Bayleton)
Circu
Reviewer
TOX

RDI: Section Head: RJH: Date: 7/2/82: RDS: Date: 7/2/82 TS-769: RCB: Reviewer: E. Zager: LDT: X77324: CM#2: RM: 810: Date: 7/6/82